

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF LYNETTE BANGAREE

I, Lynette Bangaree, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based upon my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration are true and correct copies of my proof of citizenship: the picture page of my current U.S. Passport, issued in 2014; the picture page of my U.S. Passport issued in 1993, showing that I was a citizen prior to September 11, 2001; and my Certificate of Naturalization from 1992.

3. On September 11, 2001, I was present at Ground Zero when the terrorist attacks of the World Trade Center Towers occurred. I broke my ankle in the process of escaping the area, and I experienced shock then and PTSD afterwards due to the horrible events I witnessed. At the time, as now, I worked at Stroock & Stroock & Lavan LLP, a law firm, as an accountant. I have

worked there since 1987, 32 years. Leading up to 9/11, Stroock's offices were located at 180 Maiden Lane, just blocks from the towers.

4. 9/11 started as a beautiful morning. That day, I took a different subway train to work than normal. I had taken my baby to daycare and decided to try a different route. I usually took the E train, which went right into the World Trade Center, and I would walk straight out to Maiden Lane to work. On 9/11 I took the train to Fulton Street instead and exited the subway a block or two from the World Trade Center towers. It was shortly before 9 am. As I exited, I saw that the North Tower was on fire. Papers were floating around in the air. I saw people standing in the windows above where the flames were. I remember one person in particular who was standing in the window and waving something helplessly.

5. As I was standing there with other people looking up at Tower 2, I heard the second plane approaching. I was frozen to the spot and did not know whether to move or not, because I did not know what its path was, exactly. Everyone thought the plane was flying very low, and it sounded like someone put their foot on the accelerator as it approached. It was a terrible sound. I saw the second plane fly straight into the building while I was standing there. I saw the huge fireball, which was horrible. Debris rained down and people were running around screaming. I was in a state of shock. Somehow in the chaos I injured my foot, probably when I tried running away. I do not remember falling or having anyone step on me, but I felt like I could not move my feet. I looked down and saw that my right foot was swollen around the ankle.

6. Someone helped me back down into the subway, where I was helped into a storefront. People tried putting ice on my ankle, and I stayed there for a bit, but then police officers or security guards told us everyone needed to leave the subway because they were closing down the area. Someone helped me walk down the street to 180 Maiden Lane, where Stroock's office

was. I met some coworkers outside the building, and we all went to the East River together. They helped me walk. We were taken by ferry to Jersey City, NJ, and while we were on the ferry, we saw one of the towers fall. In Jersey City a coworker took me to his house in Nutley, NJ. My foot was swollen and in pain during this time.

7. That day my sister-in-law took me to Mountainside Hospital, where an x-ray showed that I had a fractured calcaneus (heel bone). There were other 9/11 victims there, along with police officers, and I gave a statement about my experience and injuries. An orthopedist confirmed the diagnosis the next day. I was placed in a cast and given crutches—no surgery. I underwent extensive physical therapy and other treatments. I did not return to work until March 2002 because it was difficult to get around. So as a result of these terrorist attacks, I suffered a broken ankle on September 11, 2001 and was out of work for six months. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received following the horrific events of 9-11.

8. I also experienced PTSD from my trauma on 9/11. At the time it was very extreme. After I came back to work at Stroock, in the spring of 2002, I had a panic attack at my desk. I was taken to a hospital downtown where I was diagnosed. I was given medicine and saw a counselor for a few years afterwards. I try to work on myself a lot now, to heal. 20 years later, I cannot believe how surreal the whole experience was. I still work at Stroock, in the same neighborhood, so I pass by the Ground Zero area every day. Depending on what is going on in my life, I still relive those moments. The memories are still there, still fresh. Each time I see the area it reminds me of 9/11, whether I want it to or not. I feel like my body's cells get antsy when I walk by. I have not gone to the 9/11 Museum yet because a friend went and told me please don't go, it's too soon. But I did go to the site of the towers on September 11 this past year.

9. Other coworkers of mine at Stroock were also injured on 9/11, and some never came back to work. One attorney had left the firm a few years earlier and moved to a different firm with offices in World Trade. He was killed on 9/11, as were some other friends of mine who worked in the towers.

10. I received a modest worker's compensation payment, which covered the expenses of my medical treatment and physical therapy. I have not pursued a claim through the September 11th Victim Compensation Fund for my physical injuries incurred on 9/11.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 21 day of January 2020.

A handwritten signature in black ink, appearing to read 'Lynette Bangaree', is written over a horizontal line. The signature is stylized with a large loop at the beginning and a long horizontal stroke at the end.

Signature of Lynette Bangaree, Declarant

Exhibits Filed Under Seal